

<div>CITY OF SAN JOSÉ, CALIFORNIA Department of Planning, Building and Code Enforcement 801 North First Street, Room 400 San José, California 95110-1795</div> <div>STAFF REPORT</div>	Hearing Date/Agenda Number P.C.: September 25, 2002 Item: 4.a.	
	File Number RA 02-01-001	
	Application Type Appeal of the Director's Decision to Grant a Reasonable Accommodation	
	Council District 9	
	Planning Area Edenvale	
	Assessor's Parcel Number(s) 459-20-007	
PROJECT DESCRIPTION		
Completed by: Teresa Estrada		
Location: North side of Faraone Drive approximately 400 feet easterly of Heppner Lane (697 Faraone Drive)		
Gross Acreage: 0.14 Net Acreage: 0.14 et Density: 7.8 DU/AC		
Existing Zoning: R-1-8 Residence Existing Use: Clean and Sober Living Environment		
Proposed Zoning: No Change Proposed Use: Reasonable Accommodation for Clean and Sober Living Environment		
GENERAL PLAN		
Completed by: TE		
Land Use/Transportation Diagram Designation Medium Low Density Residential (8.0 DU/AC)		
Project Conformance: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> See Analysis and Recommendations		
SURROUNDING LAND USES AND ZONING		
Completed by: TE		
North: Single-family detached residence R-1-8 Residence		
East: Single-family detached residence R-1-8 Residence		
South: Single-family detached residence R-1-8 Residence		
West: Single-family detached residence R-1-8 Residence		
ENVIRONMENTAL STATUS		
Completed by: TE		
<input type="checkbox"/> Environmental Impact Report found complete <input checked="" type="checkbox"/> Exempt <input type="checkbox"/> Negative Declaration circulated on <input type="checkbox"/> Environmental Review Incomplete		
FILE HISTORY		
Completed by: TE		
Annexation Title: Robertsville No. 4		
Date: March 30, 1967		
PLANNING DEPARTMENT RECOMMENDATIONS AND ACTION		
<div><div><input type="checkbox"/> Approval <input type="checkbox"/> Approval with Conditions <input type="checkbox"/> Denial <input checked="" type="checkbox"/> Uphold Director's Decision</div><div>Date: _____</div><div>Approved by: _____ <input type="checkbox"/> Action <input type="checkbox"/> Recommendation</div></div>		
APPLICANT		
OWNER		
Support Systems Home, Inc. Kevin Richardson 1 West Campbell Avenue #B-27 Campbell, CA 95008		
Janis King 467 Saratoga Avenue #221 San Jose, CA 95136		

PUBLIC AGENCY COMMENTS RECEIVED

Completed by: TE

Department of Public Works

None received.

Other Departments and Agencies

- 1) Police Department Memorandums from David Schaeffer dated February 13, 2002 (2) and August 28, 2002.
- 2) Code Enforcement Memorandum to Peggy Rollis from Carolyn Slezak, dated March 25, 2002.

GENERAL CORRESPONDENCE

- 1) Memorandum from Linda Evans of Santa Clara County Office of the District Attorney, dated March 20, 2002.

ANALYSIS AND RECOMMENDATIONS**BACKGROUND**

The matter under consideration is an appeal of the Director's decision to grant a Request for Reasonable Accommodation from Title 20 Section 20.24.020 of the San Jose Municipal Code, which restricts permitted uses in the R-1-8 Residential Zoning District to single-family residential uses and to residential care or service facilities for six or fewer persons with one or two resident staff as provided under state law.

On January 23, 2002, the applicant, Kevin Richardson of Support Systems Homes, Inc., requested reasonable accommodation to allow the use of the subject house for up to 13 total occupants (consisting of 11 residents and 2 resident staff) as a Sober Living Environment (SLE) for residents in recovery from alcoholism addiction and chemical dependency.

The subject 0.14-gross-acre site at 697 Faraone Drive is located in a single-family detached residential neighborhood. The facility, originally built as a single-family residence in 1971, is a single-story, approximately 1,475 square-foot structure (excluding garage) and contains four bedrooms, two bathrooms, a living room, a family room, a kitchen, and a dining room. The site is surrounded by single-family detached residential uses on all sides. The subject site is currently being used as a Sober Living Environment and is certified the County of Santa Clara District Attorney's Office for up to 6 residents and 2 resident clients.

On July 29, 2002, the Director of Planning issued a "Proposed Determination for Reasonable Accommodation" which granted an occupancy to allow a total of 13 occupants, which also includes two resident staff, provided that no more than 5 residents would be licensed drivers (including staff). See the analysis section below for discussion regarding rationale for final determination about occupancy limitations.

A properly noticed Director's public hearing was subsequently requested and held on August 14, 2002. The Director of Planning received public comments and testimony. Six area residents spoke in opposition to the request, giving testimony which included concerns for the overcrowding of individuals within the household, lack of facilities and open space for the residents within the facility, the lack of parking in the neighborhood, neighborhood safety, perceived neighborhood 'incidents' caused by the residents at the

subject site, and the erosion of the quality of life. The applicant, Kevin Richardson, responded to neighborhood comments and concerns and answered questions posed by the Director.

On September 3, 2002, the Director of Planning issued a Final Director's Decision granting Reasonable Accommodation to allow a total of 13 occupants comprising up to 11 residents and two resident staff. No more than five (5) of the residents are to be licensed drivers. This final determination was based on the information contained in the application and facts submitted to date, which demonstrated that accommodation of the proposed number of residents will meet the City's ordinances and Guidelines for Reasonable Accommodation. A total of 13 persons (11 residents plus two resident staff members) can be accommodated at the location based on occupancy limitations for the Request to comply with applicable Building and Housing Code requirements.

An Appeal of the Director's Final Decision was filed by Gertrude Sandoval, on the date of the Director's Hearing. A copy of the appeal letter is attached. The primary grounds for the appeal are inadequate parking, inadequate facilities and space within the house for the residents, and the potential for increased crime in the neighborhood.

ENVIRONMENTAL REVIEW

The Director of Planning, Building and Code Enforcement has determined that this project is exempt from further environmental review pursuant to Section 15301 of the California Environmental Quality Act since the proposal involves only a minor expansion of an existing facility or use.

GENERAL PLAN CONFORMANCE

The proposed request for Reasonable Accommodation for a clean and sober living environment is consistent with the San Jose 2020 General Plan Land Use/Transportation Diagram designation of Medium Low Density Residential (8.0 DU/AC) in that no expansion of the existing structure or increase in the number of dwelling units is proposed.

ANALYSIS

Unlike many decisions made by the City affecting the use of private property, the granting of Requests for Reasonable Accommodation is not equivalent to a discretionary land use permit. There are several State and Federal laws that limit or prohibit the discretionary powers of local municipalities with regard to affording reasonable accommodations from land use requirements in order to make housing opportunities available to disabled persons. The analysis section of this report provides an overview of these regulations and relevant City ordinances and policies that provide the basis for decisions on these matters. A copy of a memo related to this issue dated November 2, 2001 from the City Attorney to the City Council is attached as background.

Overview of Laws Pertaining to Requests for Reasonable Accommodation

Federal Fair Housing Act. The Federal Fair Housing Act Amendments, adopted in 1988, prohibit housing discrimination based upon disabilities or handicaps. Recovering drug addicts and alcoholics are specifically included in the definition of "handicapped" under this law. Most residents of Residential Care Facilities and Residential Service Facilities fall within the protection of these laws. These laws drastically limit the ability of cities to use their discretionary land use authority to regulate group living arrangements involving disabled persons. Both federal and state laws expressly make it unlawful to discriminate through public or

private land use practices, decisions, and authorizations. Discrimination includes restrictive covenants, zoning laws, denials of use permits, and other actions that make housing opportunities unavailable. Under the Federal Fair Housing Act, local governments are required to make "reasonable accommodation" to the needs of persons with disabilities in the application of its policies, procedures and regulations.

Proposition 36. Proposition 36, also known as "The Substance Abuse and Crime Prevention Act", was passed by 61% of California voters on November 7, 2000 and became effective on July 1, 2001. The intent of this initiative is to divert first- and second-time non-violent defendants, probationary and paroled individuals charged with simple drug possession or drug use offenses from incarceration by requiring residency into community-based substance abuse treatment programs. The passing of this initiative has created the need for additional sober living environments (SLEs) on a state wide basis and has likely increased the number of recent Requests for Reasonable Accommodation in San Jose.

Group Home Ordinance. In 1998, the City Council adopted the "Group Home Ordinance" in order to bring the San Jose Municipal Code into compliance with federal and state legislation which requires that local zoning regulations not discriminate against persons with disabilities. Section 20.160.010 of the Zoning Code states that it is the policy of the City of San Jose to provide reasonable accommodation for persons with disabilities seeking fair access to housing in the application of its zoning laws, policies, and process. The principle of reasonable accommodation is an explicit requirement of the Federal Fair Housing Act.

The Zoning Code establishes the procedures for making a determination about the reasonableness of a requested accommodation and identifies the specific factors that must be considered prior to granting an accommodation.

Santa Clara County Alcohol & Drug Residential Facilities Certification. As a result of the passage of Proposition 36, facilities such as those being requested are required to obtain approval from the District Attorney's (DA) Office under the Santa Clara County Alcohol & Drug Residential Facilities Certification Program. Under County certification, the DA's Office is responsible to monitor operation of the facility in order to compliance with applicable laws. The applicants have indicated that they have applied to modify their certification, which was originally issued by the District Attorney's Office for 6 clients and 2 staff. The change to the certification is pending the outcome of the granting of this accommodation.

Staff Response to Appeal of the Reasonable Accommodation Decision

As identified in Gertrude Sandoval's letter of appeal, the primary issues of concern are regarding the inadequate parking, inadequate facilities and space within the house for the residents, and the potential for increased crime in the neighborhood.

As previously indicated, the Federal and State laws pertaining to the Fair Housing Act, pre-empt local jurisdictions from imposing regulations that would preclude or discriminate against group living arrangements involving "disabled" persons. Requests for Reasonable Accommodation are *not* land use permits. Therefore they cannot be subject to any of conditions such as those which might be issued for Conditional Use Permits or other discretionary land use permits. For this reason, the Zoning Ordinance requires the less restrictive "consideration" of certain factors rather than the making of required findings before the granting of a request for reasonable accommodation.

Consideration of the eight (8) factors as established under Zoning Ordinance and noted below are designed to elicit and consider the factual basis for the decision, and further provide a basic test for "reasonableness."

Pursuant to the Zoning Ordinance, consideration the following factors are to be made on a case-by-case basis prior to the granting of a Request for Reasonable Accommodation:

1. Special needs created by the disability.
2. Potential benefit to the residents that can be accommodated by the requested modification.
3. Potential impact on surrounding uses.
4. Physical attributes of the property and structure.
5. Alternative accommodations which may provide an equivalent level of benefit to the applicant.
6. In the case of a determination involving a single-family dwelling, whether the household would be considered a single housekeeping unit if it were not using special services that are required because of the disabilities of the residents.
7. Whether the requested accommodation would impose an undue financial or administrative burden on the City.
8. Whether the requested accommodation would require a fundamental alteration in the nature of a City program.

Since the appeal letter questions the adequacy or appropriateness of “considerations” that were identified in the Director’s Final Determination of Reasonable Accommodation, for purposes of clarity, this section of the report is structured to identify the “eight consideration factors” for approval with inclusion of excerpts or summaries from the appeal letter that are relevant to each factor. A complete copy of the letter of appeal is also attached.

The appellant notes a statement in the Proposed Director’s Reasonable Accommodation Determination that the conclusion, ‘The interior and exterior characteristics of the subject property...are not adequate to accommodate the requested use consistent with the single family character of the neighborhood.’ It should be noted that planning staff identified at the Director’s hearing that this statement is a typo in that the ‘not’ should have been excluded from the conclusion. The Director’s Final Determination of Reasonable Accommodation was corrected accordingly.

Factors 1 & 2: Special Needs and Benefits of the Accommodation

Based on the passage of Proposition 36, the voters of California have mandated the diversion of first- and second-time non-violent defendants, probationary and paroled individuals charged with simple drug possession or drug use offenses from incarceration by requiring residency into community-based substance abuse treatment programs. The District Attorney’s Office has indicated that such eligible individuals will need to participate by residing at such facilities for periods up to about six months in order to achieve successful rehabilitation. Further, the DA’s Office has indicated the need to establish a substantial number of new facilities beyond the number that currently exists, in order to provide supervised, short-term residential environments to comply with the mandate. Coupled with the fact that the Fair Housing Act recognizes that such individuals that are required to participate in such programs are determined to be “disabled”, the Director can adequately deem that appropriate consideration has been made in that special needs are created by the disability. Further, there is a benefit to the residents that would be accommodated by the granting of the accommodation by providing a housing opportunity that might otherwise not be as affordable.

The appellant has not identified an issue with regards to this consideration.

Factor 3: Potential Impact on Surrounding Uses.

In assessing this factor, the Director must consider the potential impact on surrounding uses. More specifically, in this instance, an appropriate assessment would evaluate the impacts of such a facility, which might be substantially different than those impacts ordinarily created by the “typical” occupancy of the existing single family house.

In this case, the Director has determined parking impacts caused by an increase in the number of residents could, if not appropriately restricted, impact adjacent uses. The subject property has the physical ability to accommodate two parked cars in the existing attached garage, two cars on the driveway and one car along the curb in front of the subject residence. Any number of regularly-parked cars in excess of five (5) could arguably affect or impact an adjacent property. It was for this reason, a limitation was included in the accommodation that the number of licensed drivers residing in the subject house (including staff) be limited to five so that parking would not visually or physically impact adjacent residential uses. The applicant has indicated that because of the nature of the proposed occupancy, many of the potential residents will not be allowed to, or be able to drive, due to either the suspension of driver’s licenses or economic inability to afford a private vehicle. The applicant has further stated that the restriction of occupancy to no more than five (5) licensed drivers would be feasible and not pose any undue hardship. It should be noted that the applicant had indicated that the garage was previously used for common area, however, it has been cleared for parking use and will be controlled and monitored.

The appellant cites concerns in the appeal letter for increased crime in the neighborhood. Written comments provided by several neighbors identified a number of ‘incidences’, and attributed them to the subject facility. No evidence has been provided that these incidences are significant negative impacts to the neighborhood, or directly attributable to the operation of Support Systems Homes, Inc. facility.

Subsequent to the filing of the appeal and per staff’s request, the Police Department verified calls for service over the last three years and has found that there has been one reported incident and one call for police service associated with the site (the details of which were unfounded). The Police Department indicated that one or two calls per year for an address is about average and those associated with this site is not out of the ordinary. Based on the recent memorandum from the Police Department dated August 28, 2002, adequate consideration on this matter has now been more accurately confirmed. In this case, there is no evidence that the proposed facility will cause any potential impacts on surrounding uses.

The general obligation with monitoring the use and operation of the facility is the responsibility of the District Attorney’s Office. Based on information from the DA’s Office, the passage of Proposition 36 will likely result in many similar requests for such facilities distributed throughout communities in California. They operate a “Group Home Hotline” for complaints at 1.800.447.1161.

Factor 4: Physical Attributes of the Property and Structure

The Director must consider the physical attributes of the property and structure to make a determination of the appropriateness of a facility for the number of occupants in which accommodation is being requested.

The City’s Housing Codes and the Uniform Building Codes identify standards, whereby the appropriate maximum number of occupants of a residential structure can be determined based on the size (square footage). Based on the review of the floor plan and room size calculations provided by the applicant and subsequent application of the Housing Code requirements, the size and configuration of the subject house totaling 1,475 square feet (excluding the garage) can accommodate a maximum of 13 residents.

Section 17.20.270 of the San José Municipal Code and Section 503.2 of the Uniform Building Code, 1994 edition, establishes as minimum requirements (excluding closets) 70 square feet of sleeping area for two persons, 120 square feet of sleeping area for three persons; 170 square feet of sleeping area for four persons and an additional 50 square feet of sleeping area is required for each additional person.

The subject property includes four (4) bedrooms consisting of 227-, 114-, 104-, and 191-square feet. The house provides common living area consisting of an approximately 217-square-foot living room and an approximately 270-square-foot family room. An approximately 191-square foot kitchen/dining area seats up to 6 persons at the table. Two bathrooms in the home provide facilities for 6.5 persons per bathroom.

The Housing Codes do not identify specific size requirements for the size of non-bedroom areas, but the subject house has a number of rooms for general living uses to accommodate 13 people, albeit perhaps not comfortably all at the same time in any single room. Approximately 37 square feet of common living area is provided per person. The rear yard, comprised of approximately 1,320 square feet provides open space that would be equivalent, from a person-to-open space ratio, to many newer small lot single-family developments with a family of four.

The City's Guidelines for Review of Requests for Reasonable Accommodation allows the City to deny a request if it is determined that the building or additions were constructed without benefit of permit. The existing house included two wheelchair accessible ramps at the front and rear yards which never received final building department approval. These additions have been removed and adequate evidence provided by the applicant. This has been appropriately factored into the final determination by the Director. Additionally, the City's Code Enforcement Division has inspected the property and has determined that there are no current code violations for the subject site.

The appellant contends that the existing house would not constitute a "spacious" environment for its residents. The relationship between the proposed number of residents and physical space of the house is not dissimilar to a large family. While the residence may not be "spacious", the housing codes identify that the required minimum standards are being met.

Factor 5: Alternative accommodations that may provide an equivalent level of benefit to the applicant.

Given that the proposed request for accommodation complies with the housing codes and provides adequate parking to avoid impacts to adjacent properties, the identification of alternative accommodations to provide an equivalent level of benefit to the applicant were considered unnecessary in this instance.

The appellant has not identified an issue with regards to this consideration.

Factor 6: In the case of a determination involving a single-family dwelling, whether the household would be considered a single housekeeping unit if it were not using special services that are required because of the disabilities of the residents.

In 1979 the California Supreme Court held in *Adamson v. City of Santa Barbara* that under the California's Constitutional protection of the right of privacy, a local community cannot limit the number of people living together in a single housekeeping unit. The court, however, did not attempt to define a "single-housekeeping unit". Under the proposed accommodation, no physical modifications to the house are proposed in a manner that would alter its physical function as a single-family house capable of supporting a living arrangement other than a single-housekeeping unit as defined by the San Jose Municipal Code.

Residents of this structure will share common facilities and living areas as well as sharing typical household duties.

The appellant does not identify any specific issues with regard to the use of the premise as an entity other than a single housekeeping unit.

Factor 7: Whether the requested accommodation would impose an undue financial or administrative burden on the City.

The requested accommodation would not impose an undue financial or administrative burden on the City. The appellant has not identified an issue with regards to this consideration.

Factor 8: Whether the requested accommodation would require a fundamental alteration in the nature of a City program.

The requested Reasonable Accommodation for 13 total residents will not require a fundamental alteration in the nature of a City program, because it will not violate either the Housing or Building Codes, it will not require the modification of the existing structure that is compatible with the neighborhood and because the parking provided is sufficient for the requested residents.

CONCLUSION

A Request for Reasonable Accommodation, such as this, have often generated significant amounts of controversy. Because the nature of the proposed occupancy clearly would affect a legitimately identified protected class of “disabled” individuals as defined by the Federal and State Fair Housing Acts, the City has very limited ability to regulate or condition such requests in a manner that might otherwise appease the neighborhood. The City is not legally able to, nor should it outright deny a request for Reasonable Accommodation based on the unsubstantiated concerns of a neighborhood about the potential “undesirable” nature or characteristics of prospective future occupants. The City’s primary ability to exercise any amount of control for uses such as proposed is essentially limited to assurances that the Housing and Building Codes are properly met with regards to the safe, maximum occupancy of a structure. Additionally, the City may provide for reasonable safeguards to protect the neighborhood from physical impacts such as excessive parking. The appellant has not shown any evidence that is contrary to the existing public record. No evidence has been cited that the potential impacts of the proposed Request for Reasonable Accommodation are such that it would change the existing single family neighborhood.

COORDINATION

Preparation of this staff report was coordinated with the City Attorney's Office, Code Enforcement Division, Building Division, Police Department and the Santa Clara County District Attorney’s Office.

RECOMMENDATION

Planning Staff recommends that the Planning Commission uphold the Director’s Final Determination and grant the Reasonable Accommodation Request for a Sober Living Environment to operate as described in the application for up to a total of 13 occupants, comprised of eleven (11) residents and 2 resident staff. Of the said residents, no more than five (5) shall be licensed drivers.

Proposed Findings

The Planning Commission finds that the following are the relevant facts regarding this proposed project:

1. The proposed project site is located in the R-1-8 Residential Zoning District.
2. This site has a designation of Medium Low Density Residential (8.0 DU/AC) on the San Jose 2020 General Plan Land Use/Transportation Diagram.
3. The subject site is developed with one-story single-family detached dwelling unit.
4. The subject site is used for residential purposes.
5. The subject site is approximately 6,000 square feet in area.
6. The persons on whose behalf the application is being heard are considered disabled under the Fair Housing Act.
7. The applicant has requested the following accommodation to a code, policy or practice of the City of San Jose: Non single-family use in an R-1-8 Residential Zoning District: Sober Living Environment (SLE) for eleven (11) residents plus two (2) resident staff, for a total of thirteen (13) total occupants.
8. The residence is a single-story structure and consists of 4 bedrooms and two (2) bathrooms. The size and the physical configuration of the residence can accommodate a total of thirteen (13) persons and conform to the Building and Housing codes.
9. As represented in the floor plans date stamped by the Planning Department on April 15, 2002, none of the common areas of this residence (e.g., living room, dining room, and kitchen) have been altered or converted to bedrooms. The common areas are sufficient to support the use for thirteen (13) total occupants.
10. Two wheelchair accessible ramps in the front and rear yards constructed without benefit of proper building permits have been demolished, and adequate evidence has been provided demonstrating the demolition.
11. As represented in the site plan date stamped April 15, 2002, the facility can accommodate 4 cars on the site by using the garage for parking two (2) cars, by using the driveway apron for parking two (2) cars, and by using the street in front of the residence for one (1) car. The applicant has indicated the garage will be used for parking cars. With four (4) on-site parking spaces plus one (1) off-site space in front of the residence, the parking is deemed sufficient under the applicable guidelines.
12. The site is surrounded by single-family detached residences.
13. General Plan Policy specifies that residential social service programs should not be concentrated in a few areas, but should be distributed throughout the City. The nearest Request for Reasonable Accommodation is approximately 2 miles driving distance southeast of the subject

site. This area does not currently have an over-concentration of similar facilities or residential care homes.

14. The requested Reasonable Accommodation is necessary to make housing available to the persons on whose behalf the application is made.
15. The request is exempt from Environmental Review pursuant to Section 15301 of the California Environmental Quality Act (CEQA) Guidelines.
16. Appellants presented no evidence to show potential impact on surrounding uses.

Determination of Reasonableness

The focus of the Reasonable Accommodation request must be an objective analysis of the impacts associated with the total number of residents from eight (8), including two (2) resident staff as allowed “by right” under State law, to thirteen (13), including two (2) resident staff.

This Planning Commission concludes and finds, based upon an analysis of the above facts that:

1. The proposed project is consistent with the adopted San José 2020 General Plan Land Use/Transportation Diagram of the City of San José.
2. The proposed project complies with all applicable provisions of the Zoning Ordinance
3. The proposed project is in compliance with the California Environmental Quality Act.
4. The proposed request complies with Guidelines for Evaluating Requests for Reasonable Accommodation.

Finally, based upon the above-stated findings, the Planning Commission concludes the following:

1. The requested Accommodation will not impose an undue financial or administrative burden on the City.
2. Preservation of the single-family character of the zoning district of the subject property is a legitimate fundamental City interest.
3. The interior and exterior characteristics of the subject property, as well as the location of the property within the neighborhood and access to transportation and other services, are adequate to provide for the requested Reasonable Accommodation consistently with the single-family character of the neighborhood.
4. The proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in this title, or as is otherwise required in order to integrate said use with the uses in the surrounding areas.
5. The requested accommodation granted for thirteen (13) total occupants will not require a fundamental alteration in the nature of a City program.

c: Gertrude Sandoval, 673 Faraone Drive San Jose, CA 95123
Kevin Richardson, Support Systems Homes, Inc., 1 West Campbell Avenue #B-27 Campbell,
CA 95008
Janis King 467 Saratoga Avenue #221 San Jose, CA 95136
David Beyer, c/o Mary Gutierrez Bureau of Investigation 70 West Hedding Street San Jose,
CA 95110

Attachments:

Appeal Letter, Director's Final Determination, Police Department comments, Code Enforcement comments, Building Division comments, County District Attorney's Office comments, Memo from City Attorney to City Council, Guidelines for Review of Requests for Reasonable Accommodation, Location Map.

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